

Exhibit A

Re: [Records Center] Public Records Request - GORA :: R010359-050923

Jeff Gewirtz <jeff@hertz-law.com>

Wed 5/10/2023 11:56 PM

To: Clayton County Public Records Center <claytoncountyga@govqa.us>

Thank you Officer Angelic Douglas

We would like to add to this request:

Please also provide:

1. A copy of the shift schedule for Clayton County Jail for July 9 through July 15, 2022;
2. A comprehensive list of the full name, rank, and badge number of each Clayton County Sheriff Office personnel identified in #1;
3. A list of each Clayton County Sheriff Office personnel who had any contact, interaction, and or any communication with Jaylan Andrise Goodman between July 9 and July 15, 2022;
4. A list of each Clayton County Sheriff Office personnel who had any contact, interaction, and or any communication with Jarvin Cornelius Wallace between July 9 and July 15, 2022;
5. The entire personnel file of each member of Clayton County Sheriff's Office who had contact, interaction, and or any communication with Jaylan Andrise Goodman between July 9 and July 15, 2022;
6. The entire personnel file of each member of Clayton County Sheriff's Office who had contact, interaction, and or any communication with Jarvin Cornelius Wallace between July 9 and July 15, 2022;
7. The full name, rank, and badge number of each Clayton County Sheriff Office personnel who had decision making authority with regard to inmate cell placement between July 9 and July 15, 2022;
8. The full name, rank, and badge number of each Clayton County Sheriff Office personnel (and or other type of identification if not personnel of Clayton County Sheriff Office) who evaluated inmates at Clayton County Jail for mental health between July 9 and July 15, 2022

We thank you

From: Clayton County Public Records Center <claytoncountyga@govqa.us>

Sent: Wednesday, May 10, 2023 2:33 PM

To: Jeff Gewirtz <jeff@hertz-law.com>

Subject: [Records Center] Public Records Request - GORA :: R010359-050923

--- Please respond above this line ---



RE: PUBLIC RECORDS REQUEST of May 09, 2023., Reference # R010359-050923.

Dear Jeffrey Gewirtz,

Clayton County has received a public information request from you on May 09, 2023. Your request mentioned:

**"Records Custodian
Clayton County Sheriff's Office
Harold R. Banke Justice Center
9151 Tara Blvd
Jonesboro, GA 30236**

**Clayton County Jail
9157 Tara Blvd,
Jonesboro, GA 30236**

**Re: Our Client: Surviving Beneficiaries of Jaylan Andrise Goodman
Incident Date: July 14, 2022 around 8 a.m.
Location: Clayton County Jail, Clayton County, GA**

To the Records Custodian:

Our law firm represents the Surviving Beneficiaries of Jaylan Andrise Goodman., for injuries and death (hereinafter, the "incident"). This is our second letter requesting information. This first letter requesting information, dated January 13, 2023, was ignored and never responded to.

**GBI issued the following press release related to the circumstances:
<https://gbi.georgia.gov/press-releases/2022-07-15/gbi-arrests-clayton-county-jail-inmate-cellmates-death>**

Pursuant to MARSY'S LAW, Senate Resolution No. 146 Resolution Act No. 467 Ga. L. 2018, p. 1139) which amended the Georgia Constitution to enumerate that victims of crime have the right to information and records , we request a copy of any and all documentation regarding this incident, including but not limited to video, photographs, statements, and reports, as well as a copy of the following:

- 1. Inmate sheet on Jaylan Andrise Goodman**
- 2. Inmate sheet on Jarvis Cornelius Wallace**
- 3. All reports, emails, memos, and other written communications regarding Jaylan Andrise**

Goodman

- 4. All reports, emails, memos, and other written communications regarding Jarvis Cornelius Wallace**
- 5. All reports, emails, memos, and other written communications regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed**
- 6. All photos and videos regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed**
- 7. Any and all microphone and radio recordings regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;**
- 8. Any and all officers in the location of where Jaylan Andrise Goodman was killed;**
- 9. The mobile or cellular phone number of the responding officers, and any communications sent or received, and documentation collected from or on, said mobile or cellular phone, and its whereabouts during and after the incident in question;**
- 10. The complete investigatory file regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;**
- 11. Any and all witness statements regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed; and**
- 12. An inventory of any and all items reviewed at the scene or thereafter.**

This information is not being sought for commercial purposes.

The Georgia Open Records Act requires a response time within three business days. If access to the records I am requesting will take longer than three days, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

In cases where a portion of the document(s) is exempt, please redact that portion and release the remainder. If the document(s) exist(s) in electronic format, I request that they be provided in electronic form, in accordance with the Act. Please provide copies of the electronic records in a standard data export format, including Microsoft Excel (.xls or .xlsx) or Access (.mdb), DBF (.dbf) database files or ASCII text (.txt, whether tab-, semicolon-, pipe-, or comma-delimited). Please be sure to include any data dictionaries, code definitions, schema descriptions or other documentation required to accurately import and interpret the records.

To simplify the effort and reduce the workload, any data that is stored separately in relational tables may be supplied in separate electronic files. If separate tables are provided, please include any unique identifying fields that link the information to the requested database.

I look forward to your response no later than three working days from today.

Please do not hesitate to contact me if you need clarification to fulfill this request or can suggest an easier way for me to get the information I am requesting.

In the interest of timeliness, I ask that you do not attempt to contact me by postal mail. My email address is jeff@hertz-law.com and my phone number is 404-577-8111.

Thank you for your assistance in fulfilling this request.

We will issue payment of costs associated with responding to this request. In advance, thank you for your cooperation, for your time, and consideration in this matter. If you have any questions, you may call Jeffrey Gewirtz, Esq., at 678-613-3807.

Very truly yours,

Jeffrey E. Gewirtz, Esq."

--begin custom response here--- Please be advised that the Sheriffs Office is clear on your request and will advise on the information is available for release. I have sent this request over to the Legal Department as they will advise going forward with this request. Thanks so much for your patience as the Sheriffs Office is experiencing a voluminous amount of request at this time and may take approximately 3 to 4 weeks to satisfy your request.

Respectfully,

If you have any questions or need additional information, please feel free to contact my office at 7706034895.

Sincerely,

Angelic Douglas
Service Clerk
Sheriff's Office

To monitor the progress or update this request please log into the [Clayton County Public Records Center](#)

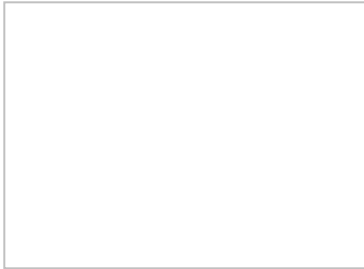
[Records Center] Public Records Request - GORA :: R010359-050923

Clayton County Public Records Center <claytoncountyga@govqa.us>

Mon 5/15/2023 2:26 PM

To:Jeff Gewirtz <jeff@hertz-law.com>

--- Please respond above this line ---



RE: PUBLIC RECORDS REQUEST of May 09, 2023., Reference # R010359-050923.

Dear Jeffrey Gewirtz,

Clayton County has received a public information request from you on May 09, 2023. Your request mentioned:

**"Records Custodian
Clayton County Sheriff's Office
Harold R. Banke Justice Center
9151 Tara Blvd
Jonesboro, GA 30236**

**Clayton County Jail
9157 Tara Blvd,
Jonesboro, GA 30236**

**Re: Our Client: Surviving Beneficiaries of Jaylan Andrise Goodman
Incident Date: July 14, 2022 around 8 a.m.
Location: Clayton County Jail, Clayton County, GA**

To the Records Custodian:

Our law firm represents the Surviving Beneficiaries of Jaylan Andrise Goodman., for injuries and death (hereinafter, the "incident"). This is our second letter requesting information. This first letter requesting information, dated January 13, 2023, was ignored and never responded to.

**GBI issued the following press release related to the circumstances:
<https://gbi.georgia.gov/press-releases/2022-07-15/gbi-arrests-clayton-county-jail-inmate->**

cellmates-death

Pursuant to MARSY'S LAW, Senate Resolution No. 146 Resolution Act No. 467 Ga. L. 2018, p. 1139) which amended the Georgia Constitution to enumerate that victims of crime have the right to information and records , we request a copy of any and all documentation regarding this incident, including but not limited to video, photographs, statements, and reports, as well as a copy of the following:

- 1. Inmate sheet on Jaylan Andrise Goodman**
- 2. Inmate sheet on Jarvis Cornelius Wallace**
- 3. All reports, emails, memos, and other written communications regarding Jaylan Andrise Goodman**
- 4. All reports, emails, memos, and other written communications regarding Jarvis Cornelius Wallace**
- 5. All reports, emails, memos, and other written communications regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed**
- 6. All photos and videos regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed**
- 7. Any and all microphone and radio recordings regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;**
- 8. Any and all officers in the location of where Jaylan Andrise Goodman was killed;**
- 9. The mobile or cellular phone number of the responding officers, and any communications sent or received, and documentation collected from or on, said mobile or cellular phone, and its whereabouts during and after the incident in question;**
- 10. The complete investigatory file regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;**
- 11. Any and all witness statements regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed; and**
- 12. An inventory of any and all items reviewed at the scene or thereafter.**

This information is not being sought for commercial purposes.

The Georgia Open Records Act requires a response time within three business days. If access to the records I am requesting will take longer than three days, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

In cases where a portion of the document(s) is exempt, please redact that portion and release the remainder. If the document(s) exist(s) in electronic format, I request that they be provided in electronic form, in accordance with the Act. Please provide copies of the electronic records in a standard data export format, including Microsoft Excel (.xls or .xlsx) or Access (.mdb), DBF (.dbf) database files or ASCII text (.txt, whether tab-, semicolon-, pipe-, or comma-delimited). Please be sure to include any data dictionaries, code definitions, schema descriptions or other documentation required to accurately import and interpret the records.

To simplify the effort and reduce the workload, any data that is stored separately in relational tables may be supplied in separate electronic files. If separate tables are provided, please include any unique identifying fields that link the information to the requested database.

I look forward to your response no later than three working days from today.

Please do not hesitate to contact me if you need clarification to fulfill this request or can suggest an easier way for me to get the information I am requesting.

In the interest of timeliness, I ask that you do not attempt to contact me by postal mail. My email address is jeff@hertz-law.com and my phone number is 404-577-8111.

Thank you for your assistance in fulfilling this request.

We will issue payment of costs associated with responding to this request. In advance, thank you for your cooperation, for your time, and consideration in this matter. If you have any questions, you may call Jeffrey Gewirtz, Esq., at 678-613-3807.

Very truly yours,

Jeffrey E. Gewirtz, Esq."

--begin custom response here--- Please be advised the Sheriffs Office is still looking into your request at this time

Respectully

If you have any questions or need additional information, please feel free to contact my office at 6784795398.

Sincerely,

Kali Huitt
Sgt. K. Huitt
Sheriff's Office

To monitor the progress or update this request please log into the [Clayton County Public Records Center](#)

Re: [Records Center] Public Records Request - GORA :: R010359-050923

Jeff Gewirtz <jeff@hertz-law.com>

Thu 6/22/2023 9:43 PM

To: Clayton County Public Records Center <claytoncountyga@govqa.us>

According to

<https://pacga.org/wp-content/uploads/2019/06/Georgia-Law-Enforcement-and-the-Open-Records-Act-A-Law-Enforcement-Officers-Guide-to-Open-Records-in-Georgia.pdf>

Exemptions are interpreted narrowly

There are no exemptions available for much of the information I am requesting on behalf of my bereaved clients

Incident reports and similarly-named documents are explicitly exempt from the open investigation exemption

We have never been provided with even a bare minimum incident report

Section M. Initial incident reports states:

Initial incident and police arrest reports are subject to the Act's disclosure requirements, regardless of whether they are part of an active investigation.

Additionally any report, whether entitled a "supplemental report," "narrative report," or similar document name that is produced as part of an initial incident report or can be characterized as such, is likewise to be disclosed.

See O.C.G.A. §§ 40-5-2(b), 50-18-72(a)(4); Napper v. Georgia Television Co., 257 Ga. 156 (1987); see also Atlanta Journal and Constitution, et al. v. City of Brunswick, et al., 265 Ga. 413 (1995)

IV. Personnel Records

Personnel records of law enforcement personnel are generally subject to public disclosure.

From: Jeff Gewirtz <jeff@hertz-law.com>

Sent: Tuesday, June 13, 2023 11:15 PM

To: Clayton County Public Records Center <claytoncountyga@govqa.us>

Subject: Re: [Records Center] Public Records Request - GORA :: R010359-050923

Again, we seek:

1. Inmate sheet on Jaylan Andrise Goodman
2. Inmate sheet on Jarvis Cornelius Wallace
3. All reports, emails, memos, and other written communications regarding Jaylan Andrise Goodman
4. All reports, emails, memos, and other written communications regarding Jarvis Cornelius Wallace
5. All reports, emails, memos, and other written communications regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed
6. All photos and videos regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed
7. Any and all microphone and radio recordings regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;
8. Any and all officers in the location of where Jaylan Andrise Goodman was killed;
9. The mobile or cellular phone number of the responding officers, and any communications sent or received, and documentation collected from or on, said mobile or cellular phone, and its whereabouts

during and after the incident in question;

10. The complete investigatory file regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;

11. Any and all witness statements regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed; and

12. An inventory of any and all items reviewed at the scene or thereafter.

1. A copy of the shift schedule for Clayton County Jail for July 9 through July 15, 2022;
2. A comprehensive list of the full name, rank, and badge number of each Clayton County Sheriff Office personnel identified in #1;
3. A list of each Clayton County Sheriff Office personnel who had any contact, interaction, and or any communication with Jaylan Andrise Goodman between July 9 and July 15, 2022;
4. A list of each Clayton County Sheriff Office personnel who had any contact, interaction, and or any communication with Jarvin Cornelius Wallace between July 9 and July 15, 2022;
5. The entire personnel file of each member of Clayton County Sheriff's Office who had contact, interaction, and or any communication with Jaylan Andrise Goodman between July 9 and July 15, 2022;
6. The entire personnel file of each member of Clayton County Sheriff's Office who had contact, interaction, and or any communication with Jarvin Cornelius Wallace between July 9 and July 15, 2022;
7. The full name, rank, and badge number of each Clayton County Sheriff Office personnel who had decision making authority with regard to inmate cell placement between July 9 and July 15, 2022;
8. The full name, rank, and badge number of each Clayton County Sheriff Office personnel (and or other type of identification if not personnel of Clayton County Sheriff Office) who evaluated inmates at Clayton County Jail for mental health between July 9 and July 15, 2022

Please let us know when we should expect this information

Rolling production is encouraged

Thank you

Jeffrey E. Gewirtz, Attorney

Jeff@hertz-law.com

678-613-3807 mobile



ERIC J. HERTZ, P.C.

Trial Lawyers

8300 Dunwoody Place | Suite 210 | Atlanta, GA 30350

Phone: (404) 577-8111 ext. 1 | Fax: (404) 577-8116

www.hertz-law.com

From: Jeff Gewirtz <jeff@hertz-law.com>

Sent: Monday, June 12, 2023 2:19 PM

To: Clayton County Public Records Center <claytoncountyga@govqa.us>

Subject: Re: [Records Center] Public Records Request - GORA :: R010359-050923

Greetings Sgt Huitt

Any news on our request for information ?

You have the May 9th request within this email but on May 11 I also sent a request for additional information requesting:

1. A copy of the shift schedule for Clayton County Jail for July 9 through July 15, 2022;
2. A comprehensive list of the full name, rank, and badge number of each Clayton County Sheriff Office personnel identified in #1;
3. A list of each Clayton County Sheriff Office personnel who had any contact, interaction, and or any communication with Jaylan Andrise Goodman between July 9 and July 15, 2022;
4. A list of each Clayton County Sheriff Office personnel who had any contact, interaction, and or any communication with Jarvin Cornelius Wallace between July 9 and July 15, 2022;
5. The entire personnel file of each member of Clayton County Sheriff's Office who had contact, interaction, and or any communication with Jaylan Andrise Goodman between July 9 and July 15, 2022;
6. The entire personnel file of each member of Clayton County Sheriff's Office who had contact, interaction, and or any communication with Jarvin Cornelius Wallace between July 9 and July 15, 2022;
7. The full name, rank, and badge number of each Clayton County Sheriff Office personnel who had decision making authority with regard to inmate cell placement between July 9 and July 15, 2022;
8. The full name, rank, and badge number of each Clayton County Sheriff Office personnel (and or other type of identification if not personnel of Clayton County Sheriff Office) who evaluated inmates at Clayton County Jail for mental health between July 9 and July 15, 2022

Please let us know when we should expect this information

Thank you

Jeffrey E. Gewirtz, Attorney

Jeff@hertz-law.com

678-613-3807 mobile



ERIC J. HERTZ, P.C.

Trial Lawyers

8300 Dunwoody Place | Suite 210 | Atlanta, GA 30350

Phone: (404) 577-8111 ext. 1 | Fax: (404) 577-8116

www.hertz-law.com

From: Jeff Gewirtz <jeff@hertz-law.com>

Sent: Thursday, June 8, 2023 10:39 AM

To: Clayton County Public Records Center <claytoncountyga@govqa.us>

Subject: Re: [Records Center] Public Records Request - GORA :: R010359-050923

Thank you Sgt Huitt

Would it be possible to get an estimate of the time frame in which we should expect a response ?

Thanks

Jeff

Jeffrey E. Gewirtz, Attorney

Jeff@hertz-law.com

678-613-3807 mobile



ERIC J. HERTZ, P.C.

Trial Lawyers

8300 Dunwoody Place | Suite 210 | Atlanta, GA 30350

Phone: (404) 577-8111 ext. 1 | Fax: (404) 577-8116

www.hertz-law.com

From: Clayton County Public Records Center <claytoncountyga@govqa.us>

Sent: Thursday, June 1, 2023 5:01 PM

To: Jeff Gewirtz <jeff@hertz-law.com>

Subject: [Records Center] Public Records Request - GORA :: R010359-050923

--- Please respond above this line ---



RE: PUBLIC RECORDS REQUEST of May 09, 2023., Reference # R010359-050923.

Dear Jeffrey Gewirtz,

Clayton County has received a public information request from you on May 09, 2023. Your request mentioned:

"Records Custodian

Clayton County Sheriff's Office

Harold R. Banke Justice Center

9151 Tara Blvd

Jonesboro, GA 30236

Clayton County Jail

9157 Tara Blvd,

Jonesboro, GA 30236

Re: Our Client: Surviving Beneficiaries of Jaylan Andrise Goodman

Incident Date: July 14, 2022 around 8 a.m.

Location: Clayton County Jail, Clayton County, GA

To the Records Custodian:

Our law firm represents the Surviving Beneficiaries of Jaylan Andrise Goodman., for injuries and death (hereinafter, the "incident"). This is our second letter requesting information. This first letter requesting information, dated January 13, 2023, was ignored and never responded to.

GBI issued the following press release related to the circumstances:

<https://gbi.georgia.gov/press-releases/2022-07-15/gbi-arrests-clayton-county-jail-inmate-cellmates-death>

Pursuant to MARSY'S LAW, Senate Resolution No. 146 Resolution Act No. 467 Ga. L. 2018, p. 1139) which amended the Georgia Constitution to enumerate that victims of crime have the right to information and records , we request a copy of any and all documentation regarding this incident, including but not limited to video, photographs, statements, and reports, as well as a copy of the following:

1. Inmate sheet on Jaylan Andrise Goodman
2. Inmate sheet on Jarvis Cornelius Wallace
3. All reports, emails, memos, and other written communications regarding Jaylan Andrise Goodman
4. All reports, emails, memos, and other written communications regarding Jarvis Cornelius Wallace
5. All reports, emails, memos, and other written communications regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed
6. All photos and videos regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed
7. Any and all microphone and radio recordings regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;
8. Any and all officers in the location of where Jaylan Andrise Goodman was killed;
9. The mobile or cellular phone number of the responding officers, and any communications sent or received, and documentation collected from or on, said mobile or cellular phone, and its whereabouts during and after the incident in question;
10. The complete investigatory file regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;
11. Any and all witness statements regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed; and
12. An inventory of any and all items reviewed at the scene or thereafter.

This information is not being sought for commercial purposes.

The Georgia Open Records Act requires a response time within three business days. If access to the records I am requesting will take longer than three days, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

In cases where a portion of the document(s) is exempt, please redact that portion and

release the remainder. If the document(s) exist(s) in electronic format, I request that they be provided in electronic form, in accordance with the Act. Please provide copies of the electronic records in a standard data export format, including Microsoft Excel (.xls or .xlsx) or Access (.mdb), DBF (.dbf) database files or ASCII text (.txt, whether tab-, semicolon-, pipe-, or comma-delimited). Please be sure to include any data dictionaries, code definitions, schema descriptions or other documentation required to accurately import and interpret the records.

To simplify the effort and reduce the workload, any data that is stored separately in relational tables may be supplied in separate electronic files. If separate tables are provided, please include any unique identifying fields that link the information to the requested database.

I look forward to your response no later than three working days from today.

Please do not hesitate to contact me if you need clarification to fulfill this request or can suggest an easier way for me to get the information I am requesting.

In the interest of timeliness, I ask that you do not attempt to contact me by postal mail. My email address is jeff@hertz-law.com and my phone number is 404-577-8111.

Thank you for your assistance in fulfilling this request.

We will issue payment of costs associated with responding to this request. In advance, thank you for your cooperation, for your time, and consideration in this matter. If you have any questions, you may call Jeffrey Gewirtz, Esq., at 678-613-3807.

Very truly yours,

Jeffrey E. Gewirtz, Esq."

--begin custom response here--- Please be advised that the Internal Affairs and the legal team are in the process of satisfying your request at this time and will update you with any further information. Sorry for the Delay as we are experiencing a voluminous amount of request at this time. I have made it clear that your firm has been patiently waiting. Thanks for your patience

Respectfully

If you have any questions or need additional information, please feel free to contact my office at 6784795398.

Sincerely,

Kali Huitt
Sgt. K. Huitt

Sheriff's Office

To monitor the progress or update this request please log into the [Clayton County Public Records Center](#)



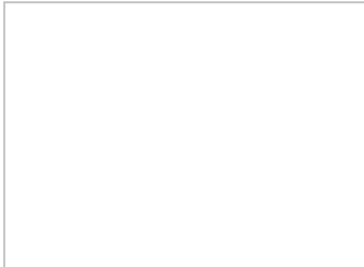
[Records Center] Public Records Request - GORA :: R010359-050923

Clayton County Public Records Center <claytoncountyga@govqa.us>

Sun 6/25/2023 5:52 PM

To: Jeff Gewirtz <jeff@hertz-law.com>

--- Please respond above this line ---



RE: PUBLIC RECORDS REQUEST of May 09, 2023., Reference # R010359-050923.

Dear Jeffrey Gewirtz,

Clayton County has received a public information request from you on May 09, 2023. Your request mentioned:

**"Records Custodian
Clayton County Sheriff's Office
Harold R. Banke Justice Center
9151 Tara Blvd
Jonesboro, GA 30236**

**Clayton County Jail
9157 Tara Blvd,
Jonesboro, GA 30236**

**Re: Our Client: Surviving Beneficiaries of Jaylan Andrise Goodman
Incident Date: July 14, 2022 around 8 a.m.
Location: Clayton County Jail, Clayton County, GA**

To the Records Custodian:

Our law firm represents the Surviving Beneficiaries of Jaylan Andrise Goodman., for injuries and death (hereinafter, the "incident"). This is our second letter requesting information. This first letter requesting information, dated January 13, 2023, was ignored and never responded to.

**GBI issued the following press release related to the circumstances:
<https://gbi.georgia.gov/press-releases/2022-07-15/gbi-arrests-clayton-county-jail-inmate->**

cellmates-death

Pursuant to MARSY'S LAW, Senate Resolution No. 146 Resolution Act No. 467 Ga. L. 2018, p. 1139) which amended the Georgia Constitution to enumerate that victims of crime have the right to information and records , we request a copy of any and all documentation regarding this incident, including but not limited to video, photographs, statements, and reports, as well as a copy of the following:

1. Inmate sheet on Jaylan Andrise Goodman
2. Inmate sheet on Jarvis Cornelius Wallace
3. All reports, emails, memos, and other written communications regarding Jaylan Andrise Goodman
4. All reports, emails, memos, and other written communications regarding Jarvis Cornelius Wallace
5. All reports, emails, memos, and other written communications regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed
6. All photos and videos regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed
7. Any and all microphone and radio recordings regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;
8. Any and all officers in the location of where Jaylan Andrise Goodman was killed;
9. The mobile or cellular phone number of the responding officers, and any communications sent or received, and documentation collected from or on, said mobile or cellular phone, and its whereabouts during and after the incident in question;
10. The complete investigatory file regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;
11. Any and all witness statements regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed; and
12. An inventory of any and all items reviewed at the scene or thereafter.

This information is not being sought for commercial purposes.

The Georgia Open Records Act requires a response time within three business days. If access to the records I am requesting will take longer than three days, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

In cases where a portion of the document(s) is exempt, please redact that portion and release the remainder. If the document(s) exist(s) in electronic format, I request that they be provided in electronic form, in accordance with the Act. Please provide copies of the electronic records in a standard data export format, including Microsoft Excel (.xls or .xlsx) or Access (.mdb), DBF (.dbf) database files or ASCII text (.txt, whether tab-, semicolon-, pipe-, or comma-delimited). Please be sure to include any data dictionaries, code definitions, schema descriptions or other documentation required to accurately import and interpret the records.

To simplify the effort and reduce the workload, any data that is stored separately in relational tables may be supplied in separate electronic files. If separate tables are provided, please include any unique identifying fields that link the information to the requested database.

I look forward to your response no later than three working days from today.

Please do not hesitate to contact me if you need clarification to fulfill this request or can suggest an easier way for me to get the information I am requesting.

In the interest of timeliness, I ask that you do not attempt to contact me by postal mail. My email address is jeff@hertz-law.com and my phone number is 404-577-8111.

Thank you for your assistance in fulfilling this request.

We will issue payment of costs associated with responding to this request. In advance, thank you for your cooperation, for your time, and consideration in this matter. If you have any questions, you may call Jeffrey Gewirtz, Esq., at 678-613-3807.

Very truly yours,

Jeffrey E. Gewirtz, Esq."

--begin custom response here--- Please be advised that the Sheriffs Office is clear on your request and will update you as soon as the information has been provided. The legal team also is in review of your request. Also I have been informed that the GBI is lead on this investigation and no information will be given until they are done with their findings. If you should have any question please contact our legal advisor in regards to any concerns. Email Alan.Parker@claytoncountyga.gov

Respectfully

Respectfully

If you have any questions or need additional information, please feel free to contact my office at 6784795398.

Sincerely,

Kali Huitt
Sgt. K. Huitt
Sheriff's Office

To monitor the progress or update this request please log into the [Clayton County Public Records Center](#)



Re: EXTERNAL: Re: Surviving Beneficiaries of Jaylan Goodman v. Clayton County Jail Officers

Jeff Gewirtz <jeff@hertz-law.com>

Thu 6/29/2023 3:45 PM

To: Alan Parker <Alan.Parker@claytoncountyga.gov>; A. Ali Sabzevari <asabzevari@fmglaw.com>; Kali Huitt <Kali.Huitt@claytoncountyga.gov>

Thank you Mr. Parker

According to

<https://pacga.org/wp-content/uploads/2019/06/Georgia-Law-Enforcement-and-the-Open-Records-Act-A-Law-Enforcement-Officers-Guide-to-Open-Records-in-Georgia.pdf>

Exemptions are interpreted narrowly

There are no exemptions available for much of the information I am requesting on behalf of my bereaved clients

Incident reports and similarly-named documents are explicitly exempt from the open investigation exemption

We have never been provided with even a bare minimum incident report

Section M. Initial incident reports states:

Initial incident and police arrest reports are subject to the Act's disclosure requirements, regardless of whether they are part of an active investigation.

Additionally any report, whether entitled a "supplemental report," "narrative report," or similar document name that is produced as part of an initial incident report or can be characterized as such, is likewise to be disclosed.

See O.C.G.A. §§ 40-5-2(b), 50-18-72(a)(4); Napper v. Georgia Television Co., 257 Ga. 156 (1987); see also Atlanta Journal and Constitution, et al. v. City of Brunswick, et al., 265 Ga. 413 (1995)

IV. Personnel Records

Personnel records of law enforcement personnel are generally subject to public disclosure.

From: Alan Parker <Alan.Parker@claytoncountyga.gov>

Sent: Thursday, June 29, 2023 3:29 PM

To: Jeff Gewirtz <jeff@hertz-law.com>; A. Ali Sabzevari <asabzevari@fmglaw.com>; Kali Huitt <Kali.Huitt@claytoncountyga.gov>

Subject: RE: EXTERNAL: Re: Surviving Beneficiaries of Jaylan Goodman v. Clayton County Jail Officers

Attorney Gewirtz,

This case is pending prosecution, pursuant to the Open Records Act, any matter pending prosecution is EXEMPT from the ORR, the only thing you are entitled to receive is the face sheet of the initial Police Report. Capt Huitt will get that to you Asap.

In the future please utilize the Gov QA portal for all Open records req.

Regards

Atty Parker

Sent from [Mail](#) for Windows



Alan Parker

Chief/Staff Attorney

Clayton County Sheriff's Office

☎ 770.477.4465

📠 678.371.4175

✉ Alan.Parker@claytoncountyga.gov

📠 770.477.4596

9157 Tara Blvd, Jonesboro, GA 30236

ClaytonSheriff.com | ClaytonCountyGA.gov



From: [Alan Parker](#)

Sent: Monday, June 26, 2023 4:38 PM

To: [Jeff Gewirtz](#); [A. Ali Sabzevari](#)

Subject: RE: EXTERNAL: Re: Surviving Beneficiaries of Jaylan Goodman v. Clayton County Jail Officers

Mr. Gewirtz,

I am the Staff Attorney for the Sheriffs Office, I have read the email and I am engaging the Capt. Huitt to find out exactly what you requested and what you are entitled to under ORR.

Sorry for the extended delay, I was not aware you were having these issues.

I will get this matter rectified.

Alan

Sent from [Mail](#) for Windows

From: [Jeff Gewirtz](#)

Sent: Monday, June 26, 2023 11:20 AM

To: [A. Ali Sabzevari](#); [Alan Parker](#)

Subject: EXTERNAL: Re: Surviving Beneficiaries of Jaylan Goodman v. Clayton County Jail Officers

This email originated from outside your organization. Do NOT click links or open attachments from this email unless you know the sender and trust the content. If you suspect this email to be a phishing attempt, please forward this message to phishing@claytoncountyga.gov.

Good morning Mr. Sabzevari and thank you for the courtesy of your reply.

I understand you represent Clayton County Jail Officials / Officers.

I included you because as it currently stands your client is refusing to provide information that is not subject to the exemptions of the Open Records Act and is forcing me to sue every single officer of Clayton County Sheriff's Office who works in corrections.

I ask that you encourage your client to provide the information I requested to avoid unnecessary parties and unnecessary expenditure of time and resources.

Thanks

Jeff

From: A. Ali Sabzevari <asabzevari@fmglaw.com>

Sent: Monday, June 26, 2023 9:09 AM

To: Jeff Gewirtz <jeff@hertz-law.com>; Alan Parker <alan.parker@claytoncountyga.gov>

Subject: RE: Surviving Beneficiaries of Jaylan Goodman v. Clayton County Jail Officers

Mr. Gewirtz,

Good morning. I don't know why I was included in this correspondence. I do not handle open records act requests for the Sheriff's Office and am not familiar with this incident.

Thank you,

A. Ali Sabzevari

Partner

Freeman Mathis & Gary, LLP

100 Galleria Parkway | Suite 1600 | Atlanta, GA 30339-5948

D: 770-303-8633 | C: 770-778-7042

asabzevari@fmglaw.com | [LinkedIn](#) | [Bio](#)

www.fmglaw.com | [Instagram](#) | [Twitter](#) | [Facebook](#)



Freeman
Mathis & Gary LLP

[[http://](#)]

AZ | CA | CT | FL | GA | IL | IN | KY | MA | NJ | NV | NY | OH | PA | RI | TN | TX

[Please read this important notice and confidentiality statement](#)

From: Jeff Gewirtz <jeff@hertz-law.com>

Sent: Sunday, June 25, 2023 6:43 PM

To: Alan Parker <alan.parker@claytoncountyga.gov>; A. Ali Sabzevari <asabzevari@fmglaw.com>

Subject: Surviving Beneficiaries of Jaylan Goodman v. Clayton County Jail Officers

Caution: This email originated from outside of the FMG organization. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Greetings Mr. Parker and Mr. Sabzevari

Our law firm represents the surviving beneficiaries of Jaylan Goodman who was murdered on July 14, 2022 at Clayton County Jail.

GBI issued the following press release:

<https://gbi.georgia.gov/press-releases/2022-07-15/gbi-arrests-clayton-county-jail-inmate-cellmates-death>

We have since learned more details about the heinous circumstances involved from the Medical Examiner (see attached 'CCMEO').

As you can see from my correspondence with the Clayton County Public Records Center (also attached), Sgt. Huitt is taking the unreasonable position that not even the bare minimum incident report is subject to disclosure, which is not correct according to what I have cited. (see attached 'JG.emai.to.CCSo.re.Jaylan.Goodman.6.22.2023' and CCSo.response.6.25.2023')

I am preparing an Ante Litem demand and Complaint.

Will you please provide the documents I have asked for ?

Bare minimum will you at least provide the incident report and a schedule of who was working ?

I appreciate your consideration of the above and look forward to hearing from you.

Thanks

Jeff

Jeffrey E. Gewirtz, Attorney

Jeff@hertz-law.com

678-613-3807 mobile



ERIC J. HERTZ, P.C.

Trial Lawyers

8300 Dunwoody Place | Suite 210 | Atlanta, GA 30350

Phone: (404) 577-8111 ext. 1 | Fax: (404) 577-8116

www.hertz-law.com

[Records Center] Public Records Request - GORA :: R010359-050923

Clayton County Public Records Center <claytoncountyga@govqa.us>

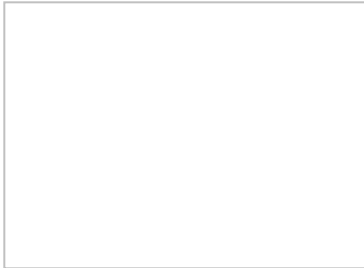
Fri 6/30/2023 4:11 PM

To:Jeff Gewirtz <jeff@hertz-law.com>

Attachments:

[scanner_co.clayton.ga.us_20230630_100951_R.pdf](#)

--- Please respond above this line ---



RE: PUBLIC RECORDS REQUEST of May 09, 2023., Reference # R010359-050923.

Dear Jeffrey Gewirtz,

Clayton County has received a public information request from you on May 09, 2023. Your request mentioned:

**"Records Custodian
Clayton County Sheriff's Office
Harold R. Banke Justice Center
9151 Tara Blvd
Jonesboro, GA 30236**

**Clayton County Jail
9157 Tara Blvd,
Jonesboro, GA 30236**

**Re: Our Client: Surviving Beneficiaries of Jaylan Andrise Goodman
Incident Date: July 14, 2022 around 8 a.m.
Location: Clayton County Jail, Clayton County, GA**

To the Records Custodian:

Our law firm represents the Surviving Beneficiaries of Jaylan Andrise Goodman., for injuries and death (hereinafter, the "incident"). This is our second letter requesting information. This first letter requesting information, dated January 13, 2023, was ignored and never responded to.

GBI issued the following press release related to the circumstances:

<https://gbi.georgia.gov/press-releases/2022-07-15/gbi-arrests-clayton-county-jail-inmate-cellmates-death>

Pursuant to MARSY'S LAW, Senate Resolution No. 146 Resolution Act No. 467 Ga. L. 2018, p. 1139) which amended the Georgia Constitution to enumerate that victims of crime have the right to information and records , we request a copy of any and all documentation regarding this incident, including but not limited to video, photographs, statements, and reports, as well as a copy of the following:

- 1. Inmate sheet on Jaylan Andrise Goodman**
- 2. Inmate sheet on Jarvis Cornelius Wallace**
- 3. All reports, emails, memos, and other written communications regarding Jaylan Andrise Goodman**
- 4. All reports, emails, memos, and other written communications regarding Jarvis Cornelius Wallace**
- 5. All reports, emails, memos, and other written communications regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed**
- 6. All photos and videos regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed**
- 7. Any and all microphone and radio recordings regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;**
- 8. Any and all officers in the location of where Jaylan Andrise Goodman was killed;**
- 9. The mobile or cellular phone number of the responding officers, and any communications sent or received, and documentation collected from or on, said mobile or cellular phone, and its whereabouts during and after the incident in question;**
- 10. The complete investigatory file regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed;**
- 11. Any and all witness statements regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed; and**
- 12. An inventory of any and all items reviewed at the scene or thereafter.**

This information is not being sought for commercial purposes.

The Georgia Open Records Act requires a response time within three business days. If access to the records I am requesting will take longer than three days, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

In cases where a portion of the document(s) is exempt, please redact that portion and release the remainder. If the document(s) exist(s) in electronic format, I request that they be provided in electronic form, in accordance with the Act. Please provide copies of the electronic records in a standard data export format, including Microsoft Excel (.xls or .xlsx) or Access (.mdb), DBF (.dbf) database files or ASCII text (.txt, whether tab-, semicolon-,

pipe-, or comma-delimited). Please be sure to include any data dictionaries, code definitions, schema descriptions or other documentation required to accurately import and interpret the records.

To simplify the effort and reduce the workload, any data that is stored separately in relational tables may be supplied in separate electronic files. If separate tables are provided, please include any unique identifying fields that link the information to the requested database.

I look forward to your response no later than three working days from today.

Please do not hesitate to contact me if you need clarification to fulfill this request or can suggest an easier way for me to get the information I am requesting.

In the interest of timeliness, I ask that you do not attempt to contact me by postal mail. My email address is jeff@hertz-law.com and my phone number is 404-577-8111.

Thank you for your assistance in fulfilling this request.

We will issue payment of costs associated with responding to this request. In advance, thank you for your cooperation, for your time, and consideration in this matter. If you have any questions, you may call Jeffrey Gewirtz, Esq., at 678-613-3807.

Very truly yours,

Jeffrey E. Gewirtz, Esq."

--begin custom response here---

If you have any questions or need additional information, please feel free to contact my office at 6784795398.

Sincerely,

Kali Huitt
Sgt. K. Huitt
Sheriff's Office

To monitor the progress or update this request please log into the [Clayton County Public Records Center](#)



AGENCY ID (ORI)
GA0310000

CLAYTON COUNTY SHERIFF'S OFFICE INCIDENT REPORT

CASE NUMBER:
2022195002

PREMISES INFORMATION

Report Date 07/14/2022 12:37:25	Incident Start Date 07/14/2022 08:40:00	Incident End Date 07/14/2022 09:00:00
Incident Location	Address 9151 TARA BLVD Jonesboro GA 30236	

OFFENSE(S)	COUNTS
16-5-1 MURDER	
16-5-21 ASSAULT AGGRAVATED	1

VICTIM(S)

1	Name GOODMAN, JAYLAN ANDRISE	Victim Type Person/Individual	Race Black Or African American	Ethnicity Non-Hispanic
	Sex Male	D.O.B. [REDACTED]	Age [REDACTED]	Address [REDACTED]

Related Offense(s)

16-5-1 MURDER
16-5-21 ASSAULT AGGRAVATED

SUSPECT(S)

1	Name wallace, jarvin	Height	Weight	Race Black Or African American	Ethnicity Non-Hispanic
	Sex Male	D.O.B. [REDACTED]	Age [REDACTED]	Address [REDACTED]	Arrested? Yes

Related Offense(s)

16-5-1 MURDER
16-5-21 ASSAULT AGGRAVATED

OTHER PERSONS INVOLVED

1	Name CLAYTON COUNTY GOVERNMENT,	Involvement Type Caller	Race	Ethnicity
	Sex	D.O.B.	Age	Address 9151 TARA BLVD Jonesboro Georgia 30236

AGENCY ID (ORI)
GA0310000**CLAYTON COUNTY SHERIFF'S OFFICE
INCIDENT REPORT**CASE NUMBER:
2022195002**NARRATIVE**

On Thursday, July 14, 2022 at approximately 0900 hours, the Clayton County Sheriff Office Internal Affairs responded to the Clayton County Jail Medical Infirmary in reference to an inmate who was found unresponsive. The Georgia Bureau of Investigations was requested and responded to the scene to conduct an investigation.

OFFICER

Officer Involvement Type Report	Officer Name Wright, Craig 29115	Date 07/14/2022 13:01:48
Officer Involvement Type Approve	Officer Name Green, Dwight 28635	Date 07/20/2022 10:33:21

IMAGES

Redaction Log

Total Number of Redactions in Document: 4

Redaction Reasons by Page

Page	Reason	Description	Occurrences
1			4

Redaction Log

Redaction Reasons by Exemption

Reason	Description	Pages (Count)
		1(4)